

Weiland Golden Goodrich LLP
650 Town Center Drive, Suite 600
Costa Mesa, California 92626
Tel 714-966-1000 Fax 714-966-1002

WEILAND GOLDEN GOODRICH LLP
Jeffrey I. Golden, State Bar No. 133040
jgolden@wglp.com
Reem J. Bello, State Bar No. 198840
rbello@wglp.com
Ryan W. Beall, State Bar No. 313774
rbeall@wglp.com
650 Town Center Drive, Suite 600
Costa Mesa, California 92626
Telephone 714-966-1000
Facsimile 714-966-1002

Proposed Attorneys for Debtor
and Debtor-in-Possession,
Coastal International, Inc.

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA

SANTA ANA DIVISION

In re

COASTAL INTERNATIONAL, INC., a
Nevada corporation,

Debtor and Debtor-in-
Possession.

Case No. 8:19-bk-13584-TA

Chapter 11

NOTICE OF HEARING ON:

- (1) **EMERGENCY MOTION FOR ORDER
AUTHORIZING DEBTOR TO OBTAIN
POSTPETITION FINANCING PURSUANT
TO 11 U.S.C. §§ 105, 361, 362 AND 364;**
- (2) **EMERGENCY MOTION FOR ORDER
APPROVING STIPULATION FOR THE USE
OF CASH COLLATERAL PURSUANT TO
11 U.S.C. SECTIONS 363(c)(2) AND
363(b)(1) AND FEDERAL RULE OF
BANKRUPTCY PROCEDURE 4001(d) AND
FOR ORDER AUTHORIZING
MAINTENANCE OF EXISTING BANK
ACCOUNTS AND CASH MANAGEMENT
SYSTEM AND HONORING PREPETITION
CHECKS FOR A LIMITED PERIOD OF
TIME PURSUANT TO 11 U.S.C. SECTIONS
105, 345, and 363; AND**
- (3) **EMERGENCY MOTION FOR ORDER
AUTHORIZING PAYMENT AND
HONORING OF PREPETITION PAYROLL
OBLIGATIONS**

DATE: September 18, 2019

TIME: 11:00 a.m.

CTRM: 5B

**411 West Fourth Street
Santa Ana, California 92701**

Weiland Golden Goodrich LLP
650 Town Center Drive, Suite 600
Costa Mesa, California 92626
Tel 714-966-1000 Fax 714-966-1002

1 **TO THE OFFICE OF THE UNITED STATES TRUSTEE, SECURED CREDITORS, 20**
2 **LARGEST UNSECURED CREDITORS, AND ALL PARTIES IN INTEREST:**

3 **PLEASE TAKE NOTICE** that on **September 18, 2019, at 11:00 a.m. in**
4 **Courtroom 5B of the United States Bankruptcy Court located at 411 West Fourth**
5 **Street, Santa Ana, California 92701**, the Court will hear (a) the *Emergency Motion for*
6 *Order Authorizing Debtor to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105,*
7 *361, 362, and 364 ("DIP Financing Motion"); (b) the Emergency Motion for Order*
8 *Approving Stipulation for the Use of Cash Collateral Pursuant to 11 U.S.C. Sections*
9 *363(c)(2) and 363(b)(1) and Federal Rule of Bankruptcy Procedure 4001(d), Authorizing*
10 *Maintenance of Existing Bank Accounts, Cash Management System and Honoring Pre-*
11 *Petition Check for a Limited Period of Time Pursuant to 11 U.S.C. §§ 105, 345 and 363*
12 *("Cash Collateral Motion"); and (c) the Emergency Motion for Order Authorizing Payment*
13 *and Honoring of Prepetition Payroll Obligations ("Payroll Motion", and together with the*
14 *DIP Financing Motion and Cash Collateral Motion, the "Motions") filed by Coastal*
15 *International, Inc., the debtor and debtor-in-possession ("Debtor").*

16 **PLEASE TAKE FURTHER NOTICE** that a complete copy of the Motions is on file
17 with the Bankruptcy Court and can be obtained by contacting Reem J. Bello, Weiland
18 Golden Goodrich LLP, by telephone at (714) 966-1000.

19 **PLEASE TAKE FURTHER NOTICE** that any opposition to the Motions may be
20 made before or at the time of the hearing.

21 **SUMMARY OF MOTIONS**

22 By the DIP Financing Motion, the Debtor seeks an order authorizing the Debtor to
23 enter into a postpetition financing agreement with Transportation Alliance Bank Inc. dba
24 TAB Bank ("TAB Bank"). By the Cash Collateral Motion, the Debtor seeks an order
25 approving the stipulation ("Stipulation") made between Debtor and TAB Bank that enables
26 the Debtor to use cash collateral on a final basis during the chapter 11 proceedings and to
27 maintain prepetition bank accounts and cash management systems and to honor pre-
28 petition checks. By the Payroll Motion the Debtor seeks an order authorizing the Debtor

1 to make payments of payroll and other wage and salary obligations owed by the Debtor,
2 to pay ordinary course business expenses, to retain its prepetition payroll account for 30
3 days, and to direct all banks to honor Debtor's prepetition checks.

4 Approval of the Motions is in the best interest of the Estate and its creditors since
5 the Debtor requires immediate cash in order to operate and it needs to pay its employees
6 immediately.

7 Respectfully submitted,

8 Dated: September 16, 2019

WEILAND GOLDEN GOODRICH LLP

9
10 By: /s/ JEFFREY I. GOLDEN
11 JEFFREY I. GOLDEN
12 REEM J. BELLO
13 Proposed Attorneys for Debtor and
14 Debtor-in-Possession,
15 Coastal International, Inc.
16
17
18
19
20
21
22
23
24
25
26
27
28

Weiland Golden Goodrich LLP
650 Town Center Drive, Suite 600
Costa Mesa, California 92626
Tel 714-966-1000 Fax 714-966-1002

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

650 Town Center Drive, Suite 600, Costa Mesa, California 92626

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF HEARING ON: (1)EMERGENCY MOTION FOR ORDER AUTHORIZING DEBTOR TO OBTAIN POSTPETITION FINANCING PURSUANT TO 11 U.S.C. §§ 105, 361, 362 AND 364; (2)EMERGENCY MOTION FOR ORDER APPROVING STIPULATION FOR THE USE OF CASH COLLATERAL PURSUANT TO 11 U.S.C. SECTIONS 363(c)(2) AND 363(b)(1) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 4001(d); AND(3)EMERGENCY MOTION FOR ORDER AUTHORIZING PAYMENT AND HONORING OF PREPETITION PAYROLL OBLIGATIONS** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **September 16, 2019**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **September 16, 2019**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **September 16, 2019**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Theodor C. Albert, 411 W. 4th Street, 5th Floor, Santa Ana, CA 92701

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 16, 2019

Date

Kelly Adele

Printed Name



Signature

SERVICE LIST

VIA EMAIL

Office of the U.S. Trustee
Attn: Marilyn Sorensen
411 W. 4th Street, Suite 9041
Santa Ana, CA 92701
Email: Marilyn.Sorensen@usdoj.gov

Steven Waterman
Dorsey & Whitney LLP
111 S. Main Street, Suite 2100
Salt Lake City, UT 84111
Email: waterman.steven@dorsey.com

Attorneys for TAB Bank

VIA OVERNIGHT DELIVERY

Transportation Alliance Bank Inc.
dba TAB Bank
Attn: President
4185 Harrison Boulevard, Suite 200
Ogden, UT 84403

20 LARGEST CREDITORS-VIA OVERNIGHT DELIVERY

AmTrust North America
Attn: Accounts Receivable
800 Superior Ave. E
21st Floor
Cleveland, OH 44114

American Express Corp. Svcs.
Attn: US Payment FL
1801 NW 66th Ave
Suite 103A
Fort Lauderdale, FL 33313

Anthem Blue Cross
PO Box 51011
Los Angeles, CA 90051-5311

Mike Boone
4065 Lavergne
Antioch, TN 37013

Chicago Regional Council of Carpenters
12 East Erie Street
Chicago, IL 60611-2796

Shelley Cowperthwait
6802 Bayberry Creek
Las Vegas, NV 89130

Michael Gorman
11 Jeffrey Lane
Hightstown, NJ 08520

Amy Johnson
543 Wisteria Way
San Rafael, CA 94903

Laborers Trust Fund for Northern CA
PO Box 882913
San Francisco, CA 94188-2913

Jesus Lopez
4585 San Juan Avenue
Fremont, CA 94536

Northern California Carpenters Fund
PO Box 882134
San Francisco, CA 94188-2134

Dee Randall
38 Red Hill Circle
Belvedere Tiburon, CA 94920

Shell Fleet Plus- WEX BANK
PO Box 4337
Carol Stream, IL 60197-4337

Sign Pictorial Display Industry Allied
PO Box 45186
San Francisco, CA 94145

Kathleen Spangler
554 16th Avenue
San Francisco, CA 94118

Teamsters Local 631 Security Fund
PO Box 844552
Los Angeles, CA 90084-4552

Trust Fund Office Local Union 831 STD
PO Box 513435
Los Angeles, CA 90051-3435

Western Conference of Teamsters
Attn: President
2323 Eastlake Avenue East
Seattle, WA 98102-3393

Willwork Global Event Services
23 Norfolk Avenue
Suite A
South Easton, MA 02375

VIA EMAIL

Global Experience Specialist
c/o David Emerzian
McCORMICK, BARSTOW, SHEPPARD, WAYTE
7647 N. Fresno Street
Fresno, CA 93720
Email: demerzian@mccormickbarstow.com

Electronic Mail Notice List

Jeffrey I Golden jgolden@wglp.com, kadele@wglp.com;vrosales@lwgfllp.com;cbmeeker@gmail.com
United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov